

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

RONNIE JONES, ET AL.,

Plaintiffs,

VS.

CITY OF BOSTON, ET AL.,

Defendants.

NO. 05-11832-GAO

JOINT MOTION TO TAKE STATUS CONFERENCE OFF CALENDAR

The parties to the above-captioned matter hereby jointly request that the Local Rule 16.1 Scheduling Conference currently set for Tuesday, December 6, 2006 at 2:00 P.M. be taken off the Court's calendar until such time as the parties have determined that the court's intervention is required to resolve discovery disputes. As grounds therefor, the parties state as follows:

1. Counsel for plaintiffs have unavoidable scheduling conflicts during the week of December 4, 2006.

2. In accordance with the Joint Statement With A Proposed Discovery Schedule submitted by the parties on October 5, 2006, Defendants have begun producing documents for the first stage of discovery. In addition, plaintiffs have deposed former Boston Police Commissioner Kathleen O'Toole.

3. The parties have been working cooperatively to prepare the case and resolve discovery issues without the need for filing a motion to compel.

4. Under the circumstances, the parties believe that there is presently no need for the Court's intervention and that a status conference would be more useful to the parties and the Court if and when the parties are unable to resolve completely any remaining discovery issues.

WHEREFORE, the parties jointly ask that this Court cancel the Local Rule 16.1 Scheduling Conference. In the alternative, the parties request this Court to continue the Scheduling Conference to a future date that is convenient for the Court.

Respectfully submitted,

/s/ Nadine Cohen

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**Defendants, City of Boston, Boston
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Dated: November 29, 2006